

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	Adv. Pro. No. 08-01789 (SMB)  SIPA Liquidation  (Substantively Consolidated)  <b>THE BLUMS' WITNESS, EXHIBIT, AND DEPOSITION EXCERPT DISCLOSURE FOR THE HEARING ON THE TRUSTEE'S PROFIT WITHDRAWAL MOTION</b>
In re:  BERNARD L. MADOFF,  Debtor.	

**THE BLUMS' PREHEARING DISCLOSURES**

**I. WITNESSES**

At the time of hearing, Claimants Dr. Joel and Norman Blum intend to call the following witnesses (live, by deposition, or by declaration, subject to the court rules regarding same). The Blums reserve all rights to supplement this list up until the time of hearing, and reserve the right to call any witness necessary to authenticate or lay foundation for any document. The Blums reserve the right to call any other witness listed by any other party. The Blums further reserve the right to call any witness in rebuttal.

1. **Dr. Norman Blum**, c/o counsel
2. **Dr. Joel Blum**, c/o counsel
3. **Dr. Thomas Respess III**, c/o counsel

## II. EXHIBITS

The Blums hereby give notice of their intention to offer the following exhibits at the hearing. Without waiver of any objection as to authenticity or admissibility, the Blums also reserve the right to supplement this exhibit list, and to offer at hearing any exhibit listed by any other party to this proceeding. The Blums reserve the right to use any appropriate illustrative material at hearing, as well as any document or other material for rebuttal or impeachment.

<u>EX</u>	<u>Description</u>	<u>Bates No. /Deposition Exhibit No./ other identifier</u>	<u>Date</u>	<u>Objection N/A/O*</u>
Blum-1	Dr. Norman Blum's Proof of Claim for Account 1B0201	Ex. A to Blums' Pre-Hearing Brief	3/1/2009	
Blum-2	Dr. Joel Blum's Proof of Claim for Account 1B0251	Ex. B to Blums' Pre-Hearing Brief	1/27/2009	
Blum-3	Dr. Norman Blum's Proof of Claim for Account 1B0190	Ex. C to Blums' Pre-Hearing Brief	3/1/2009	
Blum-4	Principal Balance Calculation as Applied to Norman J. Blum of June 10, 2016	Ex. D to Blums' Pre-Hearing Brief	6/10/2016	
Blum-5	Notice of Trustee's Determination of Claim for Dr. Joel Blum	Ex. E to Blums' Pre-Hearing Brief	4/15/2016	
Blum-6	Notice of Trustee's Determination of Claim for Dr. Norman Blum	Ex. F to Blums' Pre-Hearing Brief	4/15/2016	
Blum-7	C.V. of Thomas Respass	Ex. A to Respass Decl. Filed in Support of Blums' Pre-Hearing Brief	9/23/2016	
Blum-8	Summary of Analysis Performed by Thomas Respass and Documents	Exs. B and C to Respass Decl. filed in Support	9/23/2016	

	Considered	of Blums' Pre- Hearing Brief		
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N – No objection

A – Authenticity

O – Other objection

### **III. DEPOSITION EXCERPTS**

Without waiver of any objection to the presentation of deposition testimony in this proceeding – particularly objections as to the requirements for live testimony and witness availability – the Blums hereby reserve the right to offer the following deposition testimony at hearing. The Blums reserve the right to supplement this list, and to offer at the hearing any testimony necessary for context or rebuttal.

<b><u>WITNESS</u></b>	<b><u>EXCERPTS P:L</u></b>
JoAnn Sala 5/19/2016	12:9 through 12:15 12:20 through 13:12 18:25 through 19:7 20:16 through 20:21 24:10 through 25:13 27:19 through 28:7 29:6 through 29:23 31:1 through 31:11 36:3 through 36:8 36:14 through 37:5 37:18 through 37:22 54:24 through 58:14 97:25 through 98:14 156:1 through 156:19 181:13 through 182:25 183:7 through 183:14 188:6 through 188:9 191:14 through 191:24 193:7 through 194:1 200:17 through 200:23 223:12 through 223:16 224:7 through 224:15

	224:16 through 225:22 271:8 through 272:11
Winifer Jackson 5/23/2016	9:18 through 10:15 11:17 through 11:24 12:1 through 14:10 15:7 through 16:1 16:12 through 16:17 16:24 through 18:3 18:8 through 18:9 18:18 through 19:2 21:18 through 21:25 22:10 through 22:18 23:15 through 23:19 25:9 through 26:7 29:2 through 29:7 30:14 through 30:17 34:3 through 34:7 34:16 through 34:18 35:7 through 35:10 36:13 through 36:23 38:1 through 38:5 38:17 through 39:4 42:19 through 43:2 43:9 through 43:22 46:9 through 46:19 50:4 through 50:13 51:14 through 52:1 54:1 through 54:9 61:19 through 61:24 62:11 through 65:6 86:19 through 87:13 102:6 through 102:12 103:4 through 103:12 104:4 through 104:10 105:14 through 106:7 106:13 through 106:21 107:21 through 108:7 109:24 through 111:22 114:2 through 114:14 115:15 through 116:1 116:25 through 117:16 122:3 through 123:12 124:19 through 126:1 127:7 through 128:4 128:13 through 129:6

	129:20 through 130:1
Dorothy Khan 5/25/2016	10:11 through 10:23 11:4 through 11:17 11:23 through 11:25 12:4 through 12:6 12:25 through 13:8 18:21 through 19:9 20:11 through 20:15 21:16 through 21:25 24:9 through 24:16 45:3 through 45:12 96:6 through 101:9 101:15 through 101:21 111:7 through 111:24
Alethea Leung 6/2/2016	9:21 through 9:23 10:4 through 10:9 11:14 through 11:17 13:12 through 13:24 16:3 through 16:23 18:25 through 19:3 19:10 through 19:13 19:19 through 19:23 20:2 through 20:21 20:24 through 21:8 22:2 through 22:15 22:25 through 23:22 38:6 through 38:11 46:17 through 46:19 47:19 through 47:24 50:9 through 50:20
Annette Bongiorno 7/8/2016	13:16 through 14:1 15:7 through 15:20 23:20 through 24:2 26:4 through 26:14 30:4 through 30:6 31:7 through 31:19 32:21 through 33:1 33:16 through 34:22 35:1 through 35:12 35:18 through 36:4 37:23 through 38:18 40:1 through 40:4 42:4 through 42:20

	53:4 through 53:14 54:22 through 55:1 57:21 through 58:5 60:6 through 61:10 61:17 through 63:2 69:4 through 69:16 76:24 through 79:3 123:20 through 125:22 126:2 through 126:6 129:11 through 129:21 143:8 through 144:1 146:2 through 146:12 146:16 through 146:19 147:14 through 148:8 151:11 through 151:25 152:18 through 152:24 158:20 through 159:2 161:3 through 161:5 161:6 through 161:21 170:4 through 170:16 171:10 through 171:12 177:4 through 177:15 178:13 through 179:10 179:23 through 181:10 189:7 through 189:16 191:4 through 191:11 191:20 through 192:10 194:10 through 195:4 197:1 through 197:24 198:6 through 198:22 204:2 through 204:11 205:7 through 206:5 210:1 through 210:16 212:24 through 213:14 216:5 through 216:16 217:4 through 217:6 218:3 through 218:16 219:9 through 220:3 220:8 through 220:10 228:8 through 228:13
Norman Blum, M.D. 5/13/2016	10:14 through 11:3 11:19 through 11:24 12:2 through 12:20 13:7 through 13:22 14:11 through 15:12

	15:19 through 15:25 20:25 through 21:12 21:18 through 22:6 22:19 through 23:7 26:6 through 26:22 27:5 through 28:10 28:22 through 29:23 30:21 through 31:14 31:18 through 32:4 34:23 through 35:8 37:8 through 37:13 38:1 through 38:25 39:17 through 39:21 40:19 through 41:11 41:17 through 41:20 42:1 through 42:13 42:18 through 42:20 43:11 through 43:23 44:5 through 44:17 45:6 through 45:17 46:24 through 47:14 47:24 through 48:16 48:22 through 49:18 50:13 through 53:25 55:8 through 56:16 58:8 through 58:17 59:25 through 60:6 60:25 through 61:19 68:6 through 68:21 69:5 through 69:17 75:14 through 76:16 77:12 through 77:24 80:3 through 80:20 81:4 through 81:25 82:5 through 83:5 84:1 through 84:24 86:10 through 86:23 94:9 through 95:7 95:18 through 96:3 97:2 through 97:22 98:1 through 98:4
Joel Alan Blum, M.D. 5/16/2016	16:11 through 16:24 17:6 through 17:12 18:16 through 18:25 19:5 through 19:17

	20:12 through 21:9 21:15 through 21:18 22:21 through 23:16 24:20 through 25:10 26:4 through 26:9 26:14 through 26:24 27:8 through 28:5 28:18 through 29:16 29:21 through 30:23 35:2 through 35:13 41:8 through 42:12 44:22 through 46:5 46:16 through 48:5 48:8 through 48:22 50:1 through 50:9 50:16 through 51:2 51:8 through 51:13 52:7 through 52:24 53:3 through 54:14 55:15 through 56:22 57:2 through 57:20 58:7 through 59:1 60:6 through 61:12 62:18 through 63:9 64:5 through 66:1 66:11 through 67:3 67:22 through 68:2 71:3 through 73:2 73:3 through 74:3 74:9 through 74:17 74:18 through 75:11 75:16 through 76:21 76:25 through 77:2 77:8 through 78:10 78:11 through 79:7 79:8 through 79:24 80:13 through 80:21
Bernard Madoff 6/15/2016	9:6 through 10:7 10:9 through 10:20 11:3 through 11:13 12:1 through 13:6 13:8 through 13:15 13:16 through 13:20 13:20 through 13:23 17:1 through 17: 12 35:9 through 35:16



	36:1 through 37:2 38:3 through 38:15 43:2 through 43:10 43:12 through 43:24 62:4 through 62:18 62:20 through 63:11 63:13 through 63:18 63:20 through 64:9 65:15 through 67:24 70:25 through 71:6 80:1 through 81:1 82:1 through 82:3
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September 30, 2016

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 30, 2016, I caused a true and correct copy of the foregoing to be served by electronic mail upon:

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